#### Attachment 11 – Program Preferences

In partnership with the Regional Stakeholder Group, the Monterey Peninsula Water Management District (MPWMD) facilitated a collaborative process to develop and implement an IRWM Plan for the region encompassing the groundwater basins and watersheds of the Monterey Peninsula, Carmel Bay and South Monterey Bay. In January 2006, DWR awarded a grant of approximately \$497,000 to MPWMD to develop and complete an integrated water management plan for the region's most pressing needs.

An important step in the planning process was to develop regional priorities. Development of a project prioritization procedure was accomplished through an iterative process that involved reviewing statewide priorities, proposing a procedure, bringing the stakeholder group together to use the procedure to prioritize projects, and then refining the procedure based on the feedback of the stakeholders during the project prioritization process. Through this process, the stakeholder group was able to combine IRWM guidelines and statewide priorities with locally identified priorities to successfully select a set of projects that best meets the Region's needs.

Development of regional goals and objectives was a key step in the integrated regional water management planning process. Goals were established for broadly outlining the IRWMP direction, whereas objectives provide a basis for decision making, guide work efforts, and may be used to evaluate project benefits. MPWMD coordinated a stakeholder outreach to determine the goals and objectives that are included in this IRWMP. The goals, which were refined over several meetings of the Technical Advisory Committee organized by the Water Management Group, are identified in **Table 11-1: Regional Goals**.

The plan objectives were developed based on the goals set for the region. Several objectives were developed in order to address the major water related issues and conflicts within the region. The objectives are more specific than regional goals. They are presented in tables: <u>Table 11-2: Water Supply and Water Quality Objectives</u> and <u>Table 11-3: Flood Protection and Erosion Prevention</u>, <u>Environmental Protection and Enhancement</u>, and <u>Regional Communication Objectives</u>.

## **Identified Regional Priorities**

Through a community outreach program, workshops, and deliberation with stakeholders, the following Regional Priorities were identified:

- meet current replacement supply and future demand targets for water supply and support the Seaside Groundwater Basin Watermaster to implement the physical solution in the Basin
- reduce the potential for flooding in Carmel Valley and at the Carmel River Lagoon
- mitigate effects of storm water runoff throughout the planning Region
- address storm water discharges into Areas of Special Biological Significance
- promote the steelhead run

These regional priorities and the projects that have been selected to meet them serve to address a number of the statewide priorities as defined by the DWR. The collaborative process of developing an IRWMP has effectively integrated water management programs and projects within the region, with a unified direction of projects and regional priorities. With stakeholder collaboration, water related conflicts can be anticipated, discussed and solved collectively.

#### **Table 11-1: Regional Goals**

## **Regional Communication and Cooperation**

Identify an appropriate forum for regional communication, cooperation, and education. Develop protocols for reducing inconsistencies in water management strategies between local, regional, State, and Federal entities.

# **Water Supply**

# Improve regional water supply reliability through environmentally responsible solutions, promote water conservation, and protect the community from drought with a focus on interagency cooperation and conjunctive use of regional water resources.

### Water Ouality

Protect and improve water quality for beneficial uses consistent with regional community interests and the RWQCB basin plan through planning and implementation in cooperation with local and state agencies and regional stakeholders.

## Flood Protection and Erosion Prevention

Ensure that flood protection and erosion prevention strategies are developed and implemented through a collaborative and watershed-wide approach and are designed to maximize opportunities for comprehensive management of water resources.

#### **Environmental Protection and Enhancement**

Preserve the environmental wealth and well-being of the Region's watersheds by taking advantage of opportunities to assess, restore and enhance natural resources of streams and watershed areas when developing water supply, water quality, and flood protection strategies.

## Table 11-2: Water Supply and Water Quality Objectives:

## **Water Supply**

- Meet water supply replacement targets set by MPWMD that satisfy existing water demand and meet the following current requirements: State Water Resources Control Board Order No. WR 95-10 (and subsequent orders); Seaside Groundwater Basin Final Decision (Case No. M66343). This is currently estimated to be approximately 12,500 acre-feet (AF) annually (note that total municipal use in 2006 was 18,830 AF).
  - Once existing demand is met (e.g., through implementation of water supply projects), achieve water supply targets set by MPWMD to meet estimated long-term future demand, based on General Plan Build-Out estimates. This is currently estimated to be approximately 4,550 acre-feet annually.
- Maintain the quantity and quality of water in the Seaside Groundwater Basin as specified in the Final Decision setting forth the adjudicated rights in the Groundwater Basin
- Minimize the impacts to sensitive species and habitats from diversions (surface and groundwater) by optimizing the use of groundwater storage and conjunctive use options.
- Maximize use of recycled water.
- Optimize conjunctive use of surface and groundwater.
- Optimize the use of groundwater
- Evaluate, advance, and create water conservation efforts throughout the Region.
- Minimize fiscal impacts to ratepayers and taxpayers.

## **Water Quality**

- Meet or exceed applicable water quality standards established by regulatory processes or by stakeholders (whichever is higher).
- Improve water quality for environmental resource (e.g. steelhead). Protect surface waters and groundwater basins from contamination and threat of contamination.
- Meet or exceed recycled water quality targets established by stakeholders.
- Minimize impacts from storm water (or urban) runoff through implementation of Best Management Practices or other alternatives.
- Improve stream and near-shore water quality.

Table 11-3: Flood Protection and Erosion Prevention, Environmental Protection and Enhancement, and Regional Communication Objectives

Flood Protection and Erosion Prevention	Environmental Protection and Enhancement	Regional Communication
<ul> <li>Develop regional projects and plans that are necessary to protect existing infrastructure and sensitive habitats from flood and erosion damage.</li> <li>Develop approaches for adaptive management that minimize maintenance and repair requirements.</li> <li>Protect quality and availability of water while preserving or restoring ecologic and stream functions; enhance aquatic and riparian resources when appropriate.</li> <li>Provide community benefits beyond flood protection and erosion prevention, such as public access, open space, recreation, agricultural preservation, and economic development.</li> </ul>	<ul> <li>Identify opportunities to assess, protect, enhance, and/or restore natural resources when developing water management strategies and projects.</li> <li>Protect and enhance sensitive species and their habitats in the regional watersheds.</li> <li>Minimize adverse effects on biological and cultural resources, including riparian habitats, habitats supporting sensitive plant or animal species, and archaeological sites when implementing strategies and projects.</li> <li>Identify opportunities for open spaces, trails and parks along streams and other recreational areas in the watershed that can be incorporated into water supply, water quality, or flood protection projects.</li> <li>Identify and integrate elements from appropriate Federal and State species protection and recovery plans and from other similar plans (e.g., SWRCB Critical Coastal Areas Program) that are applicable to the region.</li> </ul>	<ul> <li>Meet or exceed State and Federal regulatory orders.</li> <li>Identify strategies for protecting both infrastructure and environmental resources.</li> <li>Foster collaboration between regional entities to minimize and resolve potential conflicts and to obtain support for environmentally responsible water supply solutions.</li> <li>Build relationships with State and Federal regulatory agencies and other water forums and agencies to facilitate the permitting, planning and implementation of water-related projects.</li> <li>Identify opportunities for public education about the need, complexity, and cost of strategies, programs, plans, and projects to improve water supply, water quality, flood management, coastal conservation, and environmental protection.</li> </ul>
		1

#### **Statewide Priorities Addressed:**

## Lower Carmel River Restoration and Floodplain Enhancement

Statewide Priorities addressed: Practice Integrated Flood Management Expand Environmental Stewardship Protect Surface Water and Groundwater Quality Climate Change Response

Climate Change Response - Establish migration corridors, re-establish river-floodplain hydrologic continuity, re-introduce anadromous fish populations to upper watersheds, and enhance and protect upper watershed forests and meadow systems

The Lower Carmel River Restoration and Floodplain Enhancement Project, on land known as the Odello fields, addresses an urgent regional need, as well as meeting many regional objectives and statewide priorities. The result of this project will be to restore a regular flooding regimen, which will return essential natural ecological function to the Carmel River watershed lower floodplain/estuary system. By re-establishing the hydrologic continuity of the river, the project meets several statewide priorities, including, but not limited to, Climate Change Response, Protecting Groundwater Quality, and Integrated Flood Management. The remaining parcels of the property that are not part of the historic floodplain will remain as an agricultural preserve for an organic farming operation and native plant nursery and a public trail will be located along the southern edge of the agricultural preserve. This will afford the public access to the land and an opportunity to learn about the floodplain, experience nature, and become better stewards for the environment.

The magnitude of the change this project will affect on the Carmel River, regarding both the reduction in impacts to humans via flooding in urban areas, as well as the improvement to the ecosystem for wildlife, will be great. The project will restore riparian and wetland habitat on the historic floodplain and provide important habitat for sensitive species including steelhead trout, California red-legged frog, and western pond turtle, as well as six additional state species of concern. Additionally, the project will provide increased quantity and quality of breeding and/or foraging habitat for 27 avian species that have been identified by one or more bird conservation plans as species of concern.

County Services Area 50 (CSA-50) is a developed area located along the north side of the lower Carmel River. Of the 147 acres of developed land in CSA-50, approximately 105 acres flood during the 50-year flood event and all 147 acres flood during the 100-year event. The proposed project will significantly reduce flood flows and help protect private property from flood damage.

This Stormwater Flood Management project is not part of the state's flood management plan, and thus does not receive State funding in regard to PRC §5096.824 or §75034. Flood Management of the Lower Carmel River will undoubtedly afford better emergency preparedness and response for the area. This will not only assist the community to respond to flooding, but also mitigate the effects of Climate Change on the area, by providing an outlet for floodwaters in the lower Carmel River.

The proposed project will also serve to address one of the watershed's most critical environmental problems – very low or no flow in the Lower Carmel River and Lagoon in the dry season – by enabling increased recharge of groundwater on the restored floodplain.

The project will provide additional filtration for sediment and nutrients through the creation of a functioning floodplain and associated riparian habitat and wetlands, resulting in increased water quality in the surface and groundwater flows entering the Carmel River Lagoon, the Carmel Bay (state-designated Area of Special Biological Significance, Marine Protected Area, and Critical Coastal Area) and the Monterey Bay National Marine Sanctuary. The hydrologic dynamics of the lagoon drive the functioning of the ecosystem. The amount and quality of water in the lagoon determine the available habitat for significant species.

## **Carmel River Watershed Volunteer Program**

Statewide Priorities addressed:

Expand Environmental Stewardship - Proposals that contain projects that practice, promote, improve, and expand environmental stewardship to protect and enhance the environment by improving watersheds, floodplains, and instream functions and to sustain water and flood management ecosystems.

As detailed in the CRWVP's goals and objectives, the purpose of the project is to encourage and create community ownership and involvement in the monitoring, stewardship and restoration of the Carmel River watershed. By activating and educating the public regarding issues affecting water management, the CRWVP addresses most of the statewide priorities as identified by DWR and SWRCB. It also represents progress towards the regional goals and objectives outlined in the RWM Plan. For example, increasing levels of science literacy and understanding of hydrologic function and watershed ecology will benefit all efforts to address water supply, water quality and flood control issues. A more informed and aware citizenry is better able to dialog with the usual stakeholders leading integrated water resource efforts, such as water agencies, businesses and scientists. Further, by being active in education, stewardship and monitoring of the Carmel River, members of the public are taking productive steps to protect and preserve the natural resources their community relies on for a strong economy, quality of life, and public health and safety. As all residents in the watershed are beneficiaries of responsible use of these resources, the improved awareness and engagement resulting from CRWVP will help reduce conflicts when they arise, and help foster community-based and collegial solutions to the challenges this watershed and the region face.

Each project in the Monterey Peninsula IRWM Plan will ultimately benefit from the efforts of the CRWVP. This is because an educated and engaged population is a prerequisite for achieving the overall goals of the IRWM Plan and each individual project in the IRWM Plan group proposal. Responsible leadership by Regional stakeholders and the RWMG is critical but insufficient to realize true, sustainable improvements in the region's water supply reliability, water quality, overall environmental health and flood protection. Awareness on the part of the residents of the region, and furthermore, individual action towards progress, are necessary complements to the leadership of the stakeholder organizations.

As stated, the anticipated future changes to the Carmel River watershed, which include dam removal and reduced diversions, will also require the establishment of baseline monitoring results in water quality, flow and habitat. Only with these baseline levels clearly established will the benefits of dam removal, lagoon enhancement and overdrafting

corrections be measurable. An engaged public taking ownership of the watershed's health are critical complements to these large scale infrastructure changes.

The CRWVP is focused solely on the Carmel River watershed, but with success this model could be expanded to the full Monterey Peninsula IRWM Region, offering benefits to each stakeholder project, other watersheds and to all beneficiaries in the Central Coast Funding Area. The model could be further scaled up to benefit other funding areas throughout the state as well.

#### Seaside Groundwater Basin Aquifer Storage and Recovery

Statewide Priorities addressed:

Address critical water supply or water quality needs of disadvantaged communities (- not so much as the community as a whole, but by being inclusive, we can make that case) within the region

Protect Surface Water and Groundwater Quality

**Drought Preparedness** 

Use and Reuse Water More Efficiently

Climate Change Response Actions

Expand Environmental Stewardship

Ensure Equitable Distribution of Benefits

In an effort to address critical water supply for the region, inclusive of all the disadvantaged communities that reside within, MPWMD proposes to construct the second phase of a project to divert excess flow in the Carmel River in winter to the Seaside Groundwater Basin and extract the water from the Seaside Basin in the dry season. The operation reduces impacts from dry season diversions in the Carmel River and improves water quality in the Seaside Basin.

Beginning in the 1960s, the region exceeded its surface storage supplies and the local water company (California American Water) increasingly turned to well water pumping to meet demand. As early as 1967, the damage to the environment from increased water extraction was raised. Currently, about 80% of water used within the MPWMD boundary is collected, stored, and distributed by the California American Water Company (CAW or Cal-Am), which serves 95% of the residents and businesses in the Monterey Peninsula Region. The Carmel Valley alluvial groundwater basin provides approximately 65% of the water used in the Monterey Peninsula area. Groundwater pumping from this alluvial aquifer has resulted in depleted storage, reduced streamflow in the Carmel River, and impaired habitat conditions for steelhead trout and red-legged frogs. Typically, during the dry season between June and November, the lower seven miles of the Carmel River are dewatered. Recharge to the aquifer is derived from surface flows after the beginning of the rainy season. During the rainy season when streamflow resumes, the alluvial aquifer fills in all years except during droughts. In 1995, the State Water Resources Control Board ordered CAW to reduce its Carmel River diversions by about 70% to reduce impacts to public trust resources and in 1998, SWRCB determined that the Carmel River was fully appropriated during the dry season.

The ASR Project satisfies many statewide priorities as well as addressing an essential priority need in the region. Critical water supply issues, quality of the groundwater, drought preparedness, climate change adaptation and mitigation, and ensuring an equitable distribution of benefits are just a few of the statewide priorities that will be addressed by the Seaside Groundwater Basin Aquifer Storage and Recovery project. The project will be vital to the health of the region's water supply for the majority of Monterey Peninsula, inclusive of all DACs in the region, for present and future generations.

Efficient and effective groundwater basin management is a vital need in the Region to address the need for water from the residents in the communities without bringing further harm to the local ecosystem. With the Aquifer Recovery and Storage Project in the Seaside Groundwater Basin, the region will considerably be more prepared for supply issues that may arise due to drought. With the advance of climate change, it is absolutely vital that the effects of over-pumping in the Carmel River Basin be resolved.

#### Sanitary Sewer System Repair and Replacement in the Cities of Monterey and Pacific Grove

Statewide Priorities addressed:
Ensure Equitable Distribution of Benefits
Protect Surface Water and Groundwater Quality
Expand Environmental Stewardship
Climate Change Response Actions
Practice Integrated Flood Management

This critical project will repair or replace gravity and force main sewer lines in the Cities of Monterey and Pacific Grove where moderate to severe deterioration has been observed and where failure is imminent. Old or damaged sewer lines can lead to discharges of untreated waste through exfiltration to adjacent soil and groundwater, or through sewage system overflows that result from catastrophic pipe failures or ruptures. In addition to being a threat to Areas of Special Biological Significance (ASBS) and the Monterey Bay National Marine Sanctuary (MBNMS), aging sanitary sewer infrastructure is a major contributing factor to local beach closures and postings. Protecting these fragile and vital ecosystems remains a top priority in the region and meets with a variety of the state's priorities.

By ensuring a functional sewer system in the Cities of Monterey and Pacific Grove, the project will help ensure that the public remains safe and that there is equitable access to open healthy beaches. A breakdown in the local sewer system would cause tremendous difficulties, including traffic closures and loss of services to residents of these communities.

Restoration of the sewer system in the Cities of Monterey and Pacific Grove will serve an essential function of adapting to and mitigating the results of climate change. With increased storm water, a functioning sewer system is critical to avoid urban flooding and potential health hazards to residents of both cities..

## **Implementation of Solid Waste Removal Technology**

Statewide Priorities addressed:

Expand Environmental Stewardship - Proposals that contain projects that practice, promote, improve, and expand environmental stewardship to protect and enhance the environment by improving watersheds, floodplains, and instream functions and to sustain water and flood management ecosystems.

Protect Surface Water and Groundwater Quality

This project would curb solid waste emissions from two locations in the City of Monterey and two locations in the City of Pacific Grove. In Monterey, two sites have been chosen based on their large upstream drainage areas and their known propensity for being collection points for wayward pieces of trash. The Steinbeck Plaza/Prescott Avenue storm drain outfall in the City of Monterey and the Olivier Street/Scott Street Storm Drain are both locations that are adjacent to existing Urban Watch and First Flush monitoring locations. During the dry weather months, volunteers visit the outfalls just downstream of these sites weekly to take water samples and to observe outfall conditions. In the City of Pacific Grove, two existing storm drain diversion locations have been chosen due to the need for solids separation and removal prior to diverting urban runoff to the sanitary sewer system. These locations are ideal for this technology because solids clog diversion pumps causing failure of the system. The course of action would include the investigation of available solid waste separation technologies as well as the purchase and installation of four units.

By inserting solid waste separation technologies, the Cities of Monterey and Pacific Grove will improve the stewardship of the local ecosystem.

This project would curb solid waste emissions from two locations in the City of Monterey and two locations in the City of Pacific Grove. In Monterey, two sites have been chosen based on their large upstream drainage areas and their known propensity for being collection points for wayward pieces of trash. The Steinbeck Plaza/Prescott Avenue storm drain outfall in the City of Monterey and the Olivier Street/Scott Street Storm Drain are both locations that are adjacent to existing Urban Watch and First Flush monitoring locations. During the dry weather months, volunteers visit the outfalls just downstream of these sites weekly to take water samples and to observe outfall conditions. In the City of Pacific Grove, two existing storm drain diversion locations have been chosen due to the need for solids separation and removal prior to diverting urban runoff to the sanitary sewer system. These locations are ideal for this technology because solids clog diversion pumps causing failure of the system. The course of action would include the investigation of available solid waste separation technologies as well as the purchase and installation of four units.

#### Microbial Source Tracking in the Cities of Monterey and Pacific Grove

Statewide Priorities addressed: Ensure Equitable Distribution of Benefits Protect Surface Water and Groundwater Quality

This project will analyze water samples from the storm drain system for the source of bacteria, providing critical data for the management of bacterial contamination that leads to beach closures and postings in the Monterey Peninsula Region. Although much is known about anthropogenic sources of coliform, more diagnostic evaluation is needed to determine if a closure or a posting is caused by human or animal bacteria.

A first step in effectively addressing this issue is better identification and tracking of the sources to distinguish among wildlife, domestic animals and human contributors. The first component is, therefore, a comprehensive study using an analysis method such as ribosomal RNA typing to determine sources of coliform contamination in three watersheds that flow into the Monterey Bay National Marine Sanctuary (MBNMS). This will be a two-year project with the microbial source tracking study conducted over the first 12 month period. The second year will entail data analysis, completion of a report, and outreach and technical follow-up with the local jurisdictions to identify appropriate management measures.

The results of this study will provide the cities, County, Regional Water Quality Control Board, State Water Resources Control Board and the Sanctuary with the information they need to reduce the number of beach postings and determine the human health risk at these study locations and possibly other similar watersheds throughout the MBNMS. This will afford equitable access to beaches for all populations residing in the region, as well as visitors to the area.

This study provides a crucial link of the information necessary to protect water quality for the vital MBNMS ecosystem. By further understanding the causes of harmful bacteria, management of these resources will be much easier to implement.

#### Discussion of regional objectives synchronicity with statewide priorities.

The plan objectives were developed based on the goals set for the region. Several objectives were developed in order to address the major water related issues and conflicts within the region. The objectives are more specific than regional goals. The following tables below indicate the strategies, and objectives each project incorporates and shows whether this addresses a statewide preference (indicated with a "P").

**Table 5-2: Matching Projects with Strategies** 

	Sponsor Water Management Strategy																				
Projects	Strategies	Ecosystem Restoration	БПУП ОППЕПСАТАПИ ПАВІСАС РІОСЕСПОП АПИ	Water Supply Reliability	Flood Management	Groundwater Management	Recreation and Public Access	Storm water Capture and Management	Water Conservation	Water Quality Protection and Improvement	Water Recycling	Wetlands Enhancement and Creation	Conjunctive Use	Docalination	Imported Water	Land Use Planning	NPS Pollution Control	Surface Storage	Watershed Planning	Water and Wastewater Treatment	Motor Transford
Lower Carmel River Floodplain Enhancement Carmel River Lagoon and Beach Studies	BSLT/MCWRA/ MCPW/CRWC	P	P		P		P	P		P		P				P		P	P		
Carmel River Watershed Volunteer Program	CRWC/CWC	P	P				P			P							P		P		
Seaside Groundwater Basin Aquifer Storage and Recovery	MPWMD/CAW	P	P	P		P				P			P								
Sanitary Sewer System Repair and Replacement in the Cities of Monterey and Pacific Grove							P			P							P			P	
	Monterey/PG		P			P				P							P				
Microbial Source Tracking in the Cities of Monterey and Pacific Grove	Monterey/PG					P		P		P							P			P	

**Table 5-3: Matching Projects with Objectives** 

	Sponsor	W	ater	Supply			Water Quality					
Projects	Objectives	msupply targets	quality of water	Minimize diversion impacts.	Maximize recycled water use	Advance conservation efforts	onjunctive use	Meet or exceed standards	Improve environment	Maximize use of BMP s	Improve stream and near-shore quality	
Lower Carmel River Floodplain Enhancement Carmel River Lagoon and Beach Studies	BSLT/MCWRA/M CPW/CRWC							P	P	P	P	
Carmel River Watershed Volunteer Program	CRWC/CWC			P		P		P	P	P		
Seaside Groundwater Basin ASR	MPWMD/CAW	P	P	P	P		P	P	P			
Sanitary Sewer System Repair	Monterey/PG							P	P	P	P	
Solid Waste Removal Technology	Monterey/PG								P	P	P	
Microbial Source Tracking	Mont/PG								P	P	P	

	Sponsor	Flood Protection						menta ancem	l Protec ient	tion	Regional Communication and Cooperation					
Projects	Objectives	Protect infrastructure	Adaptive mgt.	Protect resources	community benefits	Enhance resources	Protect and enhance sensitive species		Identify recreational opportunities	Integrate recovery plans	Meet or exceed regulatory orders	Protect infrastructure and environment	Foster collaboration	Build relationships	Identify opportunities for public education	
Lower Carmel River Floodplain Enhancement Carmel River Lagoon and Beach Studies	BSLT/ MCWRA/ MCPW/CRWC	P	Р	P	P	Р	P	P	P	P	P	P	P	P	Р	
Carmel River Watershed Volunteer Program	CRWC/CWC					P	P	P	P	P	P	P	P	P	P	
Seaside Groundwater Basin ASR	MPWMD-							P		P	P	P	P	P		
Sanitary Sewer System Repair	Monterey/PG	P	P				P	P			P	P	P		P	
Solid Waste Removal Technology	Monterey/PG						P	P			P	P	P			
Microbial Source Tracking and Pacific Grove	Monterey/PG	P	P			P						P	P			

**Table 12-1 Evaluation of Statewide Priorities** 

Priorities	Statewide F	Priorities				
Project	Reduce conflict between water users or resolve water rights disputes	Implementation of TMDL's that are established or under development	Implementation of the RWQCB Watershed Management Initiative Chapters, Plans, and Policies.	Implementation of SWRCB's NPS Pollution Plan	Implementation of recommendations of the floodplain management task force, desalination task force, recycling task force, or species recovery plan	Address environmental justice or DAC concerns
Lower Carmel River Floodplain Enhancement Carmel River Lagoon and Beach Studies		N/A	P	P	P	TBD
Carmel River Watershed Volunteer Program		N/A	P	P	P	TBD
Aquifer Storage and Recovery	P	N/A	P		P	TBD
Sanitary Sewer System Repair		N/A	P	P		TBD
Implementation of Solid Waste Removal Technology		N/A	P			TBD
Microbial Source Tracking in the Cities of Monterey and Pacific Grove		N/A				TBD

N/A – no total maximum daily loads are established TBD – to be determined if new IRWM guidelines require